

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**MOTION TO SEAL CERTAIN INFORMATION FILED IN
CONNECTION WITH HARVARD'S OPPOSITION TO
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Local Rule 7.2 and the Stipulated Protective Order (Dkt. 55), Defendant President and Fellows of Harvard College (Harvard Corporation) ("Harvard") hereby moves this Court for an order sealing (1) portions of Harvard's memorandum of law filed in opposition to Students for Fair Admissions, Inc.'s ("SFFA") motion for summary judgment; (2) portions of Harvard's response to SFFA's Rule 56.1 statement; and (3) all or part of certain of the declarations and exhibits filed in support of Harvard's opposition to SFFA's motion for summary judgment. The materials that Harvard seeks to seal include information designated as Confidential or Highly Confidential–Attorneys' Eyes Only pursuant to the Stipulated Protective Order (Dkt. 55).

Harvard requests that the documents subject to this Motion be impounded until further order of the Court. In the event the Court has not previously ordered otherwise, Harvard's submissions should be returned to its undersigned counsel upon resolution of this matter.

WHEREFORE, Harvard respectfully requests that the Court grant this motion and allow portions of Harvard's memorandum in opposition to SFFA's summary judgment motion, portions of Harvard's response to SFFA's Rule 56.1 statement, and all or part of certain of the declarations and exhibits filed in connection with Harvard's opposition to SFFA's motion for summary judgment to be filed under seal on or before July 30 and to be viewed only by the Judge, her clerk(s), and Court personnel.

Respectfully submitted,

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth (BBO #665232)

William F. Lee (BBO #291960)

Andrew S. Dulberg (BBO #675405)

Elizabeth Mooney (BBO #679522)

WILMER CUTLER PICKERING

HALE AND DORR LLP

60 State Street

Boston, MA 02109

Tel: (617) 526-6687

Fax: (617) 526-5000

felicia.ellsworth@wilmerhale.com

Seth P. Waxman (*pro hac vice*)

Paul R.Q. Wolfson (*pro hac vice*)

Daniel Winik (*pro hac vice*)

WILMER CUTLER PICKERING

HALE AND DORR LLP

1875 Pennsylvania Ave. NW

Washington, D.C. 20006

Tel: (202) 663-6800

Fax: (202) 663-6363

seth.waxman@wilmerhale.com

paul.wolfson@wilmerhale.com

Debo P. Adegbile (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Tel: (212) 295-6717
Fax: (212) 230-8888
debo.adegbile@wilmerhale.com

Dated: July 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

/s/ Felicia H. Ellsworth
Felicia H. Ellsworth